

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

United States Courts
Southern District of Texas
FILED

February 23, 2022

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

vs.

RITA MARTINEZ
GENARO FUENTES

CRIMINAL NO. **M-22-0314**

SEALED INDICTMENT

Sealed
Public and unofficial staff access
to this instrument are
prohibited by court order

THE GRAND JURY CHARGES:

OVERVIEW OF THE CRIMINAL SCHEME

At all times material to the indictment:

1. Defendants Rita Martinez ("Martinez") and Genaro Fuentes ("Fuentes") are mother and son. The Defendants, along with others known and unknown to the Grand Jury, worked together to traffic and victimize women and girls in Mission, Texas.

2. From on or about 1996 to 2019, Martinez, with the assistance of others known and unknown to the Grand Jury, recruited and brought women and girls from Durango and Coahuila, Mexico, to Mission, Texas.

3. Martinez would tell the women and girls, and their families, that she would bring them to the United States to work at her restaurant or to clean houses. Martinez would then arrange and pay for "coyotes" to bring the women and girls into the United States.

4. When the women and girls arrived in Mission, Texas, Martinez informed them that they owed her a smuggling debt, and that they had to work it off in her bar, located at 7700 W. Mile 7 Road, Mission, Texas (known, alternatively, as "Perez Lounge," "Rita's Lounge," and "Rita's Sport's Bar.").

5. Martinez told the women and girls that they would make money by drinking beers with clients. Martinez claimed that the women could collect tokens for each beer sold to a client, and then she would deduct the tokens earned from the debt that they owed.

6. After some days or weeks after each woman or girl began working at Martinez's bar, Martinez would arrange for clients to take the woman or girl out of the bar to have commercial sex. The clients would arrange for these dates, and negotiate the terms (prices for particular sex acts) with Martinez herself. In her absence, they would negotiate with Fuentes, and others known and unknown to the Grand Jury. Clients would take the women and girls to nearby motels, Martinez's home, trailers behind the bar, or their personal vehicles, to engage in commercial sex.

7. If a woman or girl resisted a client's attempt to engage in commercial sex, the client would complain to Martinez. Martinez would then tell the woman or girl that she had to comply with the client's wishes in order to pay her debt.

8. Martinez used a variety of coercive means to keep the women and girls under her control, and to ensure that they would continue to engage in commercial sex with clients. She saddled the victims with impossibly high debts, threatened to report them to immigration or the police, and warned them about the harm that might come to their families in Mexico. She insulted and humiliated the women and girls. She physically assaulted them, including slapping, hitting, and dragging them by their hair, if they disobeyed her.

9. Fuentes assisted Martinez's commercial sex trafficking operation by driving the women and girls under his mother's control to and from the motels, where Martinez sent them to meet clients, selling condoms to the women and girls, and operating Rita's Lounge in his mother's absence. In his mother's absence, Fuentes pressured the women and girls to engage in commercial sex with clients. Fuentes witnessed his mother assault the women and girls under her

control, sometimes encouraging her abuse, and sometimes intervening to stop her. Fuentes would sexually assault women and girls who were newly arrived at his mother's home, telling them that he had a right to try them.

10. If a woman or girl had a small child, Martinez would persuade them to let her send it to her associates or family members, either in the United States or in Mexico, to "babysit" the child while the mother worked at Rita's Lounge. Martinez would limit the woman or girl's access to her child, telling her that she had to work more in order to see the child, and earn the money to clothe and feed it. With the assistance of others known and unknown to the Grand Jury, Martinez took one such child from his mother, placed him with Martinez's family in Mexico, and refused to return him.

Count One
(Sex Trafficking)

From on or about August 2001, to on or about 2005, in the Southern District of Texas and elsewhere, defendants,

RITA MARTINEZ
and
GENARO FUENTES

in and affecting interstate commerce, aiding and abetting each other and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, and obtain, by any means a person, namely Victim 1, knowing that Victim 1 had not attained the age of 18 and that Victim 1 would be caused to engage in a commercial sex act, and knowing that force, fraud, coercion, and any combination of such means, would be used to cause Victim 1 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1) and 2.

Count Two
(Sex Trafficking)

From on or about 2011, through on or about 2019, in the Southern District of Texas and elsewhere, defendants,

RITA MARTINEZ
and
GENARO FUENTES

in and affecting interstate and foreign commerce, aiding and abetting each other and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, namely Victim 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim 1 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1), and 2.

Count Three
(Sex Trafficking)

From on or about 2002, through on or about 2005, in the Southern District of Texas and elsewhere, defendant,

RITA MARTINEZ

in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, and obtain by any means a person, namely Victim 2, knowing that Victim 2 had not attained the age of 18 and that Victim 2 would be caused to engage in a commercial sex act, and knowing that force, fraud, coercion, and any combination of such means, would be used to cause Victim 2 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and (b)(1).

Count Four
(Sex Trafficking)

From on or about June 2003, through on or about 2010, in the Southern District of Texas and elsewhere, defendants,

RITA MARTINEZ
and
GENARO FUENTES

in and affecting interstate commerce, aiding and abetting each other and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, and obtain, by any means a person, namely Victim 3, knowing that force, fraud, coercion, and any combination of such means, would be used to cause Victim 3 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1), and 2.

Count Five
(Sex Trafficking)

From on or about August 2001, through on or about December 2005, in the Southern District of Texas and elsewhere, defendants,

RITA MARTINEZ
and
GENARO FUENTES

in and affecting interstate commerce, aiding and abetting each other and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, and obtain, by any means a person, namely Victim 4, knowing that force, fraud, coercion, and any combination of such means, would be used to cause Victim 4 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1), and 2.

Count Six
(Sex Trafficking)

From on or about 2005, through on or about 2006, in the Southern District of Texas and elsewhere, defendants,

RITA MARTINEZ

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, and obtain, by any means a person, namely Victim 5, knowing that Victim 5 had not attained the age of 18 and that Victim 5 would be caused to engage in a commercial sex act, and knowing that force, fraud, coercion, and any combination of such means, would be used to cause Victim 5 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and (b)(1).

Count Seven
(Sex Trafficking)

From on or about October 2006, through on or about March 2009, in the Southern District of Texas and elsewhere, defendants,

RITA MARTINEZ
and
GENARO FUENTES

in and affecting interstate and foreign commerce, aiding and abetting each other and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, and obtain, by any means a person, namely Victim 6, knowing that force, fraud, coercion, and any combination of such means, would be used to cause Victim 6 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1), and 2.

Count Eight
(Sex Trafficking)

From on or about 2008, through on or about 2009, in the Southern District of Texas and elsewhere, defendant,

RITA MARTINEZ

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, and obtain, by any means a person, namely Victim 7, knowing that Victim 7 had not attained the age of 18 and that Victim 7 would be caused to engage in a commercial sex act, and knowing that force, fraud, coercion, and any combination of such means, would be used to cause Victim 7 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and (b)(1).

Count Nine
(Sex Trafficking)

From on or about 2009, through on or about 2010, in the Southern District of Texas and elsewhere, defendants,

RITA MARTINEZ
and
GENARO FUENTES

in and affecting interstate and foreign commerce, aiding and abetting each other and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, namely Victim 8, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim 8 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(1), and 2.

Count Ten
(Sex Trafficking)

From on or about January 1, 2009, through on or about December 31, 2009, in the Southern District of Texas and elsewhere, defendant,

RITA MARTINEZ

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, namely Victim 9, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim 9 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and (b)(1).

Count Eleven
(Sex Trafficking)

From on or about 2012, through on or about 2014, in the Southern District of Texas and elsewhere, defendant,

RITA MARTINEZ

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, namely Victim 10, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim 10 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and (b)(1).

NOTICE OF FORFEITURE
(18 U.S.C. § 1594(d))

Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendants,

RITA MARTINEZ
and
GENARO FUENTES

that in the event of conviction of the offenses charged in Counts One through Eleven of this Indictment, the following property is subject to forfeiture:

- (1) all real and personal property that was involved in, used, and intended to be used to commit and to facilitate the commission of such violation and all property traceable to such property;
- (2) all real and personal property constituting and derived from, proceeds obtained, directly and indirectly, as a result of such violation and all property traceable to such property, including but not limited to the following:
 - a. Rita's Sports Bar - 7700 W. Mile 7 Road, Mission, Texas
 - b. 516 Francisco Street, Mission, Texas
 - c. 2508 Silver Oak Ave, Mission, Texas
 - d. 16905 Date Palm, Penitas, Texas
 - e. 6206 W. Mile 7 Road, Mission, Texas

Money Judgment

Defendants are notified that in the event of conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

Defendants are notified in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture.

A TRUE BILL

FOREPERSON

JENNIFER B. LOWERY
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY